

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

By: JG

Deputy

**Defendants.**

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**EP-22-CR-00184-FM**

**SEALED**  
**INDICTMENT**

**CT 1:** 21:846 & 841(a)(1)-Conspiracy to Possess a Controlled Substance with Intent to Distribute;

**CT 2:** 21:846 & 841(a)(1)-Conspiracy to Possess a Controlled Substance with Intent to Distribute;

**CT 3:** 21:841(a)(1)-Possession with Intent to Distribute a Controlled Substance;

**CT 4:** 21:841(a)(1)-Possession with Intent to Distribute a Controlled Substance.

### THE GRAND JURY CHARGES:

**COUNT ONE**

(21 U.S.C. §§ 846 & 841(a)(1))

That on or about July 1, 2019, to continue through and to include December 31, 2021, in the Western District of Texas, Defendants,



(1) ALICIA PEREZ-RAMIREZ,  
(2) YESMINE MENDEZ,

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others to the Grand Jury unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess a controlled substance, which offense involved cocaine, a Schedule II

Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Sections 841(a)(1) in the quantities set forth below:

**QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY**

The quantity of cocaine involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

| DEFENDANT                                                                           | QUANTITY                                                                                | STATUTE          |
|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|------------------|
| (1) ALICIA PEREZ-RAMIREZ                                                            | 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine | 841(b)(1)(A)(ii) |
| (2) YESMINE MENDEZ                                                                  | 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine | 841(b)(1)(A)(ii) |
|   | 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine | 841(b)(1)(A)(ii) |
|  | 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine | 841(b)(1)(A)(ii) |

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

(21 U.S.C. §§ 846 & 841(a)(1))

That on or about July 1, 2019, to continue through and to include December 31, 2021, in the Western District of Texas, Defendants,

**(1) ALICIA PEREZ-RAMIREZ,  
(2) YESMINE MENDEZ, and**




knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others to the Grand Jury unknown, to commit offenses against the

United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess a controlled substance, which offense involved heroin, a Schedule I Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Sections 841(a)(1) in the quantities set forth below:

**QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY**

The quantity of heroin involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

| DEFENDANT                                                                           | QUANTITY                                                                              | STATUTE         |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------|
| (1) ALICIA PEREZ-RAMIREZ                                                            | 1 kilogram or more of a mixture or substance containing a detectable amount of heroin | 841(b)(1)(A)(i) |
| (2) YESMINE MENDEZ                                                                  | 1 kilogram or more of a mixture or substance containing a detectable amount of heroin | 841(b)(1)(A)(i) |
|  | 1 kilogram or more of a mixture or substance containing a detectable amount of heroin | 841(b)(1)(A)(i) |

All in violation of Title 21, United States Code, Section 846.

**COUNT THREE**

(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)(i))

That on or about August 25, 2020, in the Western District of Texas, Defendant,

**(2) YESMINE MENDEZ,**

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of

heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i).

**COUNT FOUR**

(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)(ii))

That on or about August 25, 2020, in the Western District of Texas, Defendant,

**(2) YESMINE MENDEZ,**

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).

A TRUE BILL.

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FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY: \_\_\_\_\_

Assistant U.S. Attorney